

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
EDUCATION, *et al.*,

Defendants.

Case No. 25-cv-2990 (ER)(BCM)

**[Proposed] ORDER TO SHOW  
CAUSE REQUEST FOR  
PRELIMINARY INJUNCTION  
UNDER FEDERAL RULE OF CIVIL  
PROCEDURE 65(a)**

Upon the memorandum of law and accompanying declarations in support of Plaintiffs' motion for a preliminary injunction (ECF Nos. 10-28) ("Motion"), and Plaintiffs' complaint and accompanying exhibit (ECF No. 1), it is:

ORDERED, that the above-named Defendants show cause before the Honorable Edgardo Ramos, United States District Judge, Room 619, United States Courthouse, 40 Foley Square, New York, New York, on \_\_\_\_\_, at \_\_\_\_\_ thereof, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure preliminarily enjoining the Defendants during the pendency of this action from (1) enforcing or implementing as against Plaintiffs the directives in the March 28, 2025 letter from Education Secretary Linda McMahon to State Education Chiefs (ECF No. 1-1); and (2) modifying the U.S. Education Department's previously approved periods for Plaintiffs to liquidate their obligations under their education stabilization funds without providing notice to Plaintiffs at least fourteen (14) days prior to the effective date of such modification; and it is further

ORDERED that Plaintiffs are not required to post security; and it is further

ORDERED that service of a copy of this order by electronic mail on the U.S. Attorney's Office for the Southern District of New York on or before April \_\_, 2025, shall be deemed good and sufficient service thereof; and it is further

ORDERED that Defendants shall file their opposition papers on the Motion on or before April 24, 2025; and it is further

ORDERED that Plaintiffs shall file their reply papers on the Motion on or before April 29, 2025.

By the Court:

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Dated

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United States District Judge